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**IN THE SEVENTH JUDICIAL DISTRICT
DISTRICT COURT OF DOUGLAS COUNTY, KANSAS**

STATE OF KANSAS,)	
)	
Plaintiff,)	
)	
v.)	Case No. _____
)	
LIUQI GU,)	
)	
Defendant,)	
_____)	

COMPLAINT/INFORMATION

COMES NOW, the State of Kansas by and through Derek L. Schmidt, Kansas Attorney General, and Paul E. Brothers, Assistant Attorney General, and gives the Court to understand and be informed that:

COUNT ONE

**THEFT
K.S.A. 21-5801(a)(2) & (b)(1)
Level 5 Nonperson Felony**

That from on or about the 2nd day of November, 2016 through on or about the 30th day of October, 2018, in Douglas County, Kansas, Liuqi Gu did then and there, unlawfully, feloniously, and knowingly, obtain control over property or services by deception with the intent to permanently deprive the owner, Thermo-Fisher Scientific, of the possession, use or benefit of the property or services, to wit: Gu deceived Thermo-Fisher Scientific to receive discounts from Thermo-Fisher Scientific, and the value of the property or services was over \$100,000.00, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

COUNT TWO

**UNLAWFUL ACTS CONCERNING COMPUTERS
K.S.A. 21-5839(a)(2) & (b)(2)**

Level 5, Nonperson Felony

That from on or about the 2nd day of November, 2016, through on or about the 30th day of October, 2018, in Douglas County, Kansas, Liuqi Gu did then and there, unlawfully, feloniously, and knowingly, use a computer, computer system, computer network or any other property for the purpose of devising or executing a scheme or artifice with the intent to defraud or to obtain money, property, services or any other thing of value by means of false or fraudulent pretense or representation, to wit: Gu used a computer, computer system, or computer network to execute a scheme or artifice to defraud Thermo-Fisher Scientific or obtain money or property from Thermo-Fisher Scientific by means of false or fraudulent pretense or representation, and the monetary loss to Thermo-Fisher Scientific was more than \$100,000.00, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

COUNT THREE

THEFT

K.S.A. 21-5801(a)(2) & (b)(2)

Level 7 Nonperson Felony

That from on or about the 2nd day of November, 2016 through on or about the 30th day of October, 2018, in Douglas County, Kansas, Liuqi Gu did then and there, unlawfully, feloniously, and knowingly, obtain control over property or services by deception with the intent to permanently deprive the owner, the State of Kansas, of the possession, use or benefit of the property or services, to wit: Gu deceived the State of Kansas to avoid payment of sales tax on purchases made from Thermo-Fisher Scientific, and the value of the property or services was at least \$25,000.00 but less than \$100,000.00, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

COUNT FOUR

MAKING FALSE INFORMATION

K.S.A. 21-5824(a) & (b)

Level 8, Nonperson Felony

That on or about the 18th day of September, 2018, in Douglas County, Kansas, Liuqi Gu did then and there, unlawfully, feloniously, and knowingly, make, generate, distribute, or draw, or cause to be made, generated, distributed or drawn, any written instrument, electronic data or entry in a book of account with knowledge that such information falsely stated or represented some material matter or was not what it purported to be, with intent to defraud, obstruct the detection of a theft or felony offense or induce official action to wit: Gu falsely stated or represented purchases from Thermo-Fisher Scientific were for the use of the University of Kansas, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

COUNT FIVE

OFFICIAL MISCONDUCT

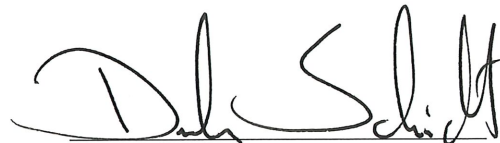
K.S.A. 21-6002(a)(3) & (b)(1)(A)
Class A Nonperson Misdemeanor

That on or about the 18th day of September, 2018, in Douglas County, Kansas, Liuqi Gu, in his public capacity as a public employee or under the color of his public employment, did then and there, unlawfully, and knowingly, use confidential information acquired in the course of and related to his employment as a public employee for his private benefit or gain or for the private benefit or gain of another to wit: Gu knowingly used confidential information acquired in the course of and related to his employment with the University of Kansas for his or another's private benefit or gain, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

COUNT SIX

INTEREST AND PENALTIES
K.S.A. 79-3615(h)
Unclassified Misdemeanor

That from on or about the 2nd day of November, 2016, through on or about the 30th day of October, 2018, in Douglas County, Kansas, Liuqi Gu, did then and there, unlawfully, and willfully, fail to make a return or to pay any tax imposed under the Kansas retailers' sales tax act to wit: Gu willfully failed to make a return or pay any tax imposed under the Kansas retailers' sales tax act for purchases he made from Thermo-Fisher Scientific, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.



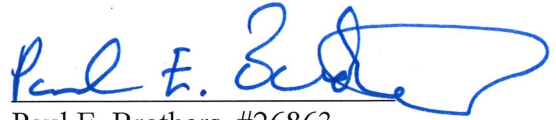
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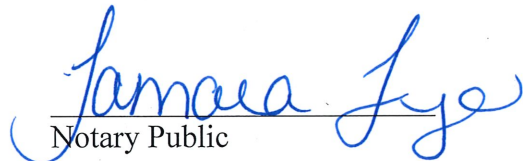
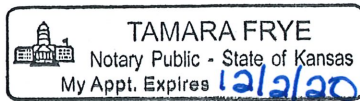
STATE OF KANSAS, SHAWNEE COUNTY, SS:

I, Paul E. Brothers, being first duly sworn, state that I have read the above and foregoing Complaint/Information and know the contents thereof, and that the same is true in substance and in fact to my best information and belief:



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SUBSCRIBED AND SWORN to before me this 5 day of December, 2019.


Notary Public

Assigned Prosecutor: Paul E. Brothers

STATE'S WITNESSES:

Dave Burlew – Special Agent, Kansas Attorney General's Office
John Anguiano – Special Agent, Kansas Attorney General's Office
Stephen Lampe – Special Agent, Federal Bureau of Investigation
Brice R. Taylor – Special Agent, Federal Bureau of Investigation
Randy Shields – Special Agent, Kansas Department of Revenue
Jon Flippin – Special Investigator, Kansas Department of Labor
Amber Dominguez – Financial Analyst, Kansas Attorney General's Office
Rick Beattie – University of Kansas
Kimberly Grunewald – University of Kansas
Doug Mersman – Thermo-Fisher Scientific
Adam M. Tschop – Thermo-Fisher Scientific
Barbara Secor – Thermo-Fisher Scientific
Patricia Hoekman – Thermo-Fisher Scientific
Luanne Lavender – Life Technologies Corporation
Janice Morrison – DHL Express

James R. Walters

Records Custodian – Thermo-Fisher Scientific

Records Custodian – University of Kansas

Records Custodian – Kansas Department of Labor

Records Custodian – Citibank

Records Custodian – J.P. Morgan Chase

Records Custodian – American Express

Records Custodian – DHL Express